

**GOVERNMENT EXHIBIT A**  
**PROPOSED JUROR QUESTIONNAIRE**

General Instructions:

This questionnaire is designed to obtain information about your background as it is related to your service as a juror in this case. Its use will substantially shorten the jury selection process. The purpose of these questions is to determine whether potential jurors can be fair to both sides and decide this case based upon the evidence presented at trial and the instructions on the law given by the presiding judge. The questions are not intended to unnecessarily inquire into personal matters. All information contained in this questionnaire will be kept confidential and under seal.

You are sworn to give true and complete answers and those answers will be available only to the Court and the parties in this case. The questionnaires belong to the Court and all copies will be returned to the Court. You are instructed not to discuss this case or the questionnaire with anyone, including your family and fellow jurors and members of the media.

CONFIDENTIAL Questionnaire

Juror Number: \_\_\_\_\_

## **CONFIDENTIAL**

Please answer each question as fully and completely as possible. Your complete candor and honesty is necessary so that both the prosecution and the defense will have the opportunity to select a jury that can be fair to both sides.

You must answer all the questions to the best of your ability. DO NOT LEAVE ANY QUESTION BLANK. It is important that the answers be yours alone. If you need more space for your responses or wish to make further comments regarding any of your answers, please use the Explanation Sheet at the end of the questionnaire. Put the number of the question you are answering on the Explanation Sheet before you write your response or comment. Please do not write on the back of any sheet.

Please keep in mind that there are no “right” or “wrong” answers, only complete and incomplete answers. Remember, *you are sworn to give true and complete answers to all questions.*

Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues which must be decided in this case. **PLEASE PRINT OR WRITE LEGIBLY, and be sure to put your juror number on each page. When you have finished answering the Questionnaire, you must sign with your name. In that signature page you are affirming the accuracy of your answers. That page will be removed by Court staff and will not be shown to any party.**

The hours of the trial will typically be 9 a.m. to 5:30 p.m., Monday through Friday. Jurors will be paid an attendance fee of \$40.00 per day, and transportation costs will be reimbursed.

Jury service is one of the highest duties and privileges of a United States citizen. The participation of people like yourself is essential to the proper administration of justice. The Court recognizes that not everyone can serve on a case of this length. However, mere inconvenience or the usual financial hardships of jury service will not be enough to excuse you from service. You must show that service as a juror in this case would cause an unacceptable personal hardship. With this in mind, please answer the following questions.

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_**Personal Background**

Juror's Name: \_\_\_\_\_ Number: \_\_\_\_\_

1. Gender: \_\_\_\_\_
2. Age: \_\_\_\_\_
3. Place of Birth: \_\_\_\_\_
4. In what city and county do you currently live?  
\_\_\_\_\_
5. Length of time at current address: \_\_\_\_\_
6. How long have you lived in Georgia? \_\_\_\_\_
7. Please indicate other areas where you have lived before: \_\_\_\_\_  
\_\_\_\_\_
8. If you do not currently live in the City of Atlanta:
  - a. Have you ever lived in Atlanta? Yes \_\_\_\_\_ No \_\_\_\_\_
  - b. Do you come to Atlanta for other reasons? Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered yes to either question, above, please explain, including when and how often.

\_\_\_\_\_
9. Describe the neighborhood(s) in which you have lived before the age of 18, including the ethnic makeup of the neighborhood(s):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
10. Do you ☐ own a home or condo, ☐ rent a home, ☐ rent an apartment, ☐ live with family/relatives, ☐ live with friends, ☐ other? \_\_\_\_\_
11. What is your current marital/domestic status? (Check all that apply.)
 

<input type="checkbox"/> Single/never married	<input type="checkbox"/> Divorced
<input type="checkbox"/> Married ____ years	<input type="checkbox"/> Divorced and remarried [# of times ____]
<input type="checkbox"/> Domestic partner	<input type="checkbox"/> Widowed
<input type="checkbox"/> Separated	<input type="checkbox"/> Live with others

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

12. If you have children or stepchildren, please list them:

	<u>Sex</u>	<u>Age</u>	<u>Live with you?</u>	<u>Education Level</u>	<u>Occupation (if any)</u>
a.					
b.					
c.					
d.					

13. Do you read, speak, write, and understand English?

\_\_\_\_\_ Yes, without difficulty      \_\_\_\_\_ Yes, with difficulty      \_\_\_\_\_ No

14. Check the highest level of education for you and your spouse or domestic partner:

	<u>You</u>	<u>Spouse/domestic partner</u>
(a) Grade school or less	_____	_____
(b) Some high school	_____	_____
(c) High school graduate	_____	_____
(d) Technical or business school	_____	_____
(e) Some college	_____	_____
(f) College degree	_____	_____
(g) Graduate work or degree	_____	_____

15. If you attended school after high school, including any trade or vocational schools, please list your areas of study and any certificates or degrees you have received:

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16. What is your job status? (Check all that apply.)

\_\_\_\_\_ Work full-time outside the home      \_\_\_\_\_ Student  
 \_\_\_\_\_ Work part-time outside the home      \_\_\_\_\_ Retired  
 \_\_\_\_\_ Full-time homemaker      \_\_\_\_\_ Disabled  
 \_\_\_\_\_ Homemaker with part-time employment      \_\_\_\_\_ Other (please explain):  
 \_\_\_\_\_ Unemployed      \_\_\_\_\_

17. If you are a student, what type of school do you go to (undergraduate, graduate, technical, vocational, business)? \_\_\_\_\_

What is your main area of study? \_\_\_\_\_

18. Please tell us your current occupation, place of employment, and the city where you work:

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**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

19. Check the following category that best describes your employer:

<input type="checkbox"/> Federal government agency	<input type="checkbox"/> Private, for-profit organization
<input type="checkbox"/> State government agency	<input type="checkbox"/> Private, not-for-profit organization
<input type="checkbox"/> County government agency	<input type="checkbox"/> Self employed
<input type="checkbox"/> City government agency	<input type="checkbox"/> Other: _____

20. Describe what you do at work: \_\_\_\_\_

How long have you held this job? \_\_\_\_\_

21. Please list all prior occupations or jobs you have had:

<u>Occupation</u>	<u>Length of Employment</u>

22. Have you been laid off, fired, or demoted from any job in the last 5 years?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe:

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23. Have any of your jobs involved supervising, managing, hiring, and/or firing others?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, how many years have you been a supervisor or manager and how many people have you supervised at any one time?

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24. What is your spouse/domestic partner's job status? (Check all that apply.)

<input type="checkbox"/> Work full-time outside the home	<input type="checkbox"/> Student
<input type="checkbox"/> Work part-time outside the home	<input type="checkbox"/> Retired
<input type="checkbox"/> Full-time homemaker	<input type="checkbox"/> Disabled
<input type="checkbox"/> Homemaker with part-time employment	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Unemployed	_____

25. Check the following category that best describes your spouse or domestic partner's employer:

<input type="checkbox"/> Federal government agency	<input type="checkbox"/> Private, for profit organization
<input type="checkbox"/> State government agency	<input type="checkbox"/> Private, not-for-profit organization
<input type="checkbox"/> County government agency	<input type="checkbox"/> Self employed
<input type="checkbox"/> City government agency	<input type="checkbox"/> Other: _____

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

26. What is your spouse or domestic partner's current occupation, job title, and place of employment?  
\_\_\_\_\_  
\_\_\_\_\_
27. If your spouse/domestic partner attended school after high school, including any trade or vocational schools, please list the areas of study and any certificates or degrees they received:  
\_\_\_\_\_  
\_\_\_\_\_
28. If there are any additional adults living in your household, please describe the type of work they do, if any:  
\_\_\_\_\_  
\_\_\_\_\_
29. What jobs, occupations, or type of work do or did your parents do?  
Mother: \_\_\_\_\_ Stepmother: \_\_\_\_\_  
Father: \_\_\_\_\_ Stepfather: \_\_\_\_\_
30. Have you, your spouse/domestic partner, or anyone close to you ever owned a business?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_
31. Do you keep track of the finances in your household, including paying bills and managing your bank accounts?  
Yes \_\_\_\_\_ No \_\_\_\_\_
32. When you file your taxes, do you prepare them yourself or have someone else prepare them?  
I prepare them myself \_\_\_\_\_ A family member or friend prepares them \_\_\_\_\_  
A professional prepares them \_\_\_\_\_ I do not file taxes \_\_\_\_\_
33. Do you have multiple bank accounts?  
Yes \_\_\_\_\_ No \_\_\_\_\_
34. Have you or your spouse/domestic partner ever served in the armed forces, including the reserves, National Guard, Merchant Marines, or ROTC?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe who served, which branch, highest rank reached, dates, and type of discharge:  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

35. Which of the following best describes the way you most prefer to work?  
 a. \_\_\_\_\_ I like to lead a group of others  
 b. \_\_\_\_\_ I like to work on my own  
 c. \_\_\_\_\_ I like to work with a group where there is no single leader  
 d. \_\_\_\_\_ I like to work in a group with another person leading me
36. Which of the following do you most agree with?  
 \_\_\_\_\_ It's never okay to bend or break rules  
 \_\_\_\_\_ Rules can be bent, but should not be broken  
 \_\_\_\_\_ Rules are meant to be broken
37. Have you ever worked with a company or business that is involved in charitable giving or philanthropy?  
 Yes, and I participated in the giving/philanthropy \_\_\_\_\_ Yes, but I didn't participate  
 No \_\_\_\_\_  
 If yes, please describe: \_\_\_\_\_  
 \_\_\_\_\_  
 If yes, did you participate in the charitable giving or philanthropy yourself?  
 Yes \_\_\_\_\_ No \_\_\_\_\_
38. Do you personally regularly contribute to charities or philanthropic organizations, either monetarily or through volunteer work?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please describe: \_\_\_\_\_  
 \_\_\_\_\_
39. Have you or anyone close to you ever worked or been involved in developing policies and procedures for any company you have worked for?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please describe: \_\_\_\_\_  
 \_\_\_\_\_
40. Have you or anyone close to you ever worked or been involved in any type of investigation or due diligence activity in any way?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please describe: \_\_\_\_\_  
 \_\_\_\_\_
41. Do you or any close friends or relatives have any experience, training, or knowledge in accounting, bookkeeping, finances, taxes or recordkeeping?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_

**CONFIDENTIAL Questionnaire**

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42. Do you or any close friends or relatives have any experience, training, or knowledge in law or criminal justice?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
43. Have you ever had any experience, training, or education in private investigation and/or surveillance?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_
44. What other special training, knowledge, expertise, or experience do you have?  
\_\_\_\_\_  
\_\_\_\_\_
45. Have you ever been accused of fraud, dishonest practices, or illegal activities?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_
46. Have you filed a grievance or complaint against anyone, including a business or employer?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain, including what kind of complaint and against whom: \_\_\_\_\_  
\_\_\_\_\_
47. Have you, anyone close to you, or your employer ever had any involvement in a legal action, lawsuit, or dispute with the United States government, or any officers, agents or employees of the United States (for example: a tax audit, social security dispute, etc.)?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

**Organizational Affiliations, Hobbies and Spare Time Activities**

48. Please list any organizations, clubs, or associations that you or your spouse/domestic partner have belonged to or participated in. (Include civic, social, religious, charitable, volunteer, political, sporting, professional, business, union, fraternal, or recreational groups. Ex. Rotary, American Civil Liberties Union, National Rifle Association, etc.):  
Self: \_\_\_\_\_  
\_\_\_\_\_  
Spouse/domestic partner: \_\_\_\_\_  
\_\_\_\_\_



**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

49. Have you or your spouse/domestic partner ever held any office, been in a leadership position, served on a committee, organized projects, or provided advice in any of the organizations you listed in question 48?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please list: \_\_\_\_\_  
\_\_\_\_\_
50. Have you ever volunteered, worked for, or donated to any charities or non-profit organizations?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
51. Have you ever done any fundraising for any organizations, including charitable and non-profit groups?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
52. Have you, a family member, or close friend ever been on the Board of Directors, been on a committee, or held a leadership position with any organization or corporation?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
53. Have you ever worked for or been involved with any minority-owned businesses?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please list: \_\_\_\_\_  
\_\_\_\_\_
54. Do you believe that minorities have less educational opportunity and/or civic participation opportunities (voting, activity in politics, etc.) than white citizens?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
55. Do you believe that minority-run charities come under more scrutiny and investigation than other charities?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

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56. Have you, a close friend, or relative ever done paid or volunteer work for any organization that is involved in social justice and racial equality?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
57. Have you, a close friend, or relative ever done paid or volunteer work for any organization that is involved in education reform or work for the underprivileged?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
58. Have you, a close friend, or relative ever done paid or volunteer work for any organization that is involved in voter registration efforts?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
59. Have you, a close friend, or relative ever done paid or volunteer work for any organization that is involved in efforts to increase literacy?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
60. Do you or your spouse/domestic partner belong to any organization that advocates for or promotes political reform?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please list: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
61. Have you or a close friend or relative ever run for, been elected to, or been appointed to public office, or worked in the office of any elected or appointed public official at the federal, state or local level?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
62. Have you or a close friend or relative ever worked as a lobbyist or government consultant?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

63. Have you ever volunteered, worked for, or donated to a political campaign or cause, or attended a political rally or fundraiser for a candidate or cause?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please describe: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
64. Have you ever heard of the 1946 Moore's Ford Bridge lynching that occurred in Monroe, Georgia?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, what do you know about it? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
65. Have you ever attended the yearly reenactment of the Moore's Ford Bridge lynching?  
 Yes \_\_\_\_\_ No \_\_\_\_\_
66. Have you ever researched, studied, or investigated any current or historical civil rights violations against African-Americans?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
67. How closely do you follow state and local politics? (Choose one)  
 \_\_\_\_\_ Very closely  
 \_\_\_\_\_ Somewhat closely  
 \_\_\_\_\_ Not very closely  
 \_\_\_\_\_ Not at all
68. How interested are you in politics? (Choose one)  
 \_\_\_\_\_ Very interested  
 \_\_\_\_\_ Somewhat interested  
 \_\_\_\_\_ Not very interested  
 \_\_\_\_\_ Not at all interested
69. Have you ever been a member of a labor union (AFL-CIO, Teamsters, etc.)?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, list which union(s), and time frame during which you were a member: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
70. List any organizations to which you have donated money in the past 5 years: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

71. Have you, a family member, or close friend ever volunteered, worked for, or contributed to the following organizations?

\_\_\_\_\_ Visions of Literacy  
 \_\_\_\_\_ Universal Humanities  
 \_\_\_\_\_ Southern Christian Leadership Conference (SCLC)  
 \_\_\_\_\_ Georgia Association of Black Elected Officials (GABEO)  
 \_\_\_\_\_ National Association for the Advancement of Colored People (NAACP)  
 \_\_\_\_\_ Rainbow Push  
 \_\_\_\_\_ Concerned Black Clergy

If yes, please describe your work or contributions: \_\_\_\_\_

\_\_\_\_\_

72. Do you or your spouse or domestic partner have bumper stickers on your car?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what do they say? \_\_\_\_\_

\_\_\_\_\_

73. Do you enjoy playing “devil’s advocate” or presenting opposing positions when arguing or debating?

Yes \_\_\_\_\_ No \_\_\_\_\_

74. Do you find it difficult to change your mind or let go of a position once you take it?

Yes \_\_\_\_\_ No \_\_\_\_\_

75. Which is your preferred way of making important decisions?

\_\_\_\_\_ I make quick decisions based on first impressions

\_\_\_\_\_ I analyze information and take my time before coming to a decision

76. Do you believe that you are overqualified for your current job?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain:

\_\_\_\_\_

77. Have you or your spouse or domestic partner ever written a letter to the editor of a newspaper, called a radio station, commented online to an article, blogged, or tweeted about a political, legal, social, legislative, or governmental issue?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

78. What radio programs, if any, do you listen to?

\_\_\_\_\_

\_\_\_\_\_

79. Do you write or maintain a blog?

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what is your blog's title, subject matter, and URL? \_\_\_\_\_  
\_\_\_\_\_

80. Do you subscribe to any social media networks, such as Facebook, MySpace, or LinkedIn?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please specify: \_\_\_\_\_  
\_\_\_\_\_

81. Do you have a Twitter account?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what is your username? \_\_\_\_\_  
\_\_\_\_\_

82. Do you regularly send text messages or IMs to people?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, approximately how many do you send a day? \_\_\_\_\_

83. Do you regularly post your thoughts and opinions on the Internet?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what sites do you regularly post on? \_\_\_\_\_  
\_\_\_\_\_**Contact and Experiences with Crime, Courts, Legal System, and Law Enforcement**

84. Have you, or has any member of your family or close friend, ever been questioned about, accused of, investigated for, arrested for or charged with a crime (other than a minor traffic offense)?

Yes \_\_\_\_\_ No \_\_\_\_\_

(a) If yes, please provide the following:

<u>Relationship of person charged (Self, Sister, etc.)</u>	<u>Crime(s) charged</u>	<u>Case Outcome</u>
_____	_____	_____
_____	_____	_____

(b) If yes, please provide a brief description of the alleged crime(s) and the events leading up to the accusation, arrest or charge: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_(c) How did you feel about that experience? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

85. Have you ever had a bad experience with law enforcement?

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

86. Have you ever had a bad experience with a lawyer or judge?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

87. Have you, your spouse/domestic partner, or any member of your family or a close friend, been involved in a claim, dispute, lawsuit, or legal proceeding with any federal, state, or local government agency?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

88. Have you, or has any member of your family or close friend or relative, ever been the victim of or witness to a crime, whether or not that crime was reported to the police?

Yes \_\_\_\_\_ No \_\_\_\_\_

- (a) If no, go to the next numbered question. If yes, please provide the following information for each person and incident:

<u>Relationship</u> (Self, sibling, etc.)	<u>Type of</u> <u>Crime</u>	<u>Victim or</u> <u>Witness</u>	<u>Reported</u> <u>to Police?</u>	<u>Was</u> <u>anyone</u> <u>Caught?</u>	<u>Outcome</u> <u>of Case</u>

- (b) How have these incidents affected your attitude towards persons charged with a crime?

\_\_\_\_\_  
\_\_\_\_\_

- (c) How do you feel the police or law enforcement authorities handled these situations?

\_\_\_\_\_  
\_\_\_\_\_

89. Have you ever had to appear in Court, or in any legal proceeding, as a plaintiff, defendant, victim, or witness for any reason other than that explained above?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please state when and explain why you appeared in Court: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

90. Have you ever served as a juror at a trial before?

Yes \_\_\_\_\_ No \_\_\_\_\_

(a) If yes, please complete the following for each trial on which you served as a juror:

When did you serve?	In what Court?	Criminal or Civil?	Charges/ Allegations?	What verdict did the jury reach?
1.				
2.				
3.				

(b) Have you ever served as a jury foreperson?

Yes \_\_\_\_\_ No \_\_\_\_\_

(c) Was there anything about your jury experience that left you dissatisfied with our justice system?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain: \_\_\_\_\_

(d) Was there anything about your experience as a juror that would make you not want to serve again?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain: \_\_\_\_\_

(e) In general, how much did you participate in that jury's discussion?

\_\_\_ Less than other jurors \_\_\_ About the same \_\_\_ More than other jurors

(f) Have you served on a grand jury?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please state where and when and whether or not you were the grand jury foreperson: \_\_\_\_\_

(g) What was your opinion of the grand jury process?

91. Have you, or any member of your family, ever had a tax return audited by the IRS or by a state or local taxing authority?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

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**Juror Number:** \_\_\_\_\_

92. Did you know or did you recognize anyone on this jury panel, or anyone else in this courtroom, before reporting for jury service today?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, who do you know and how do you know them? \_\_\_\_\_  
\_\_\_\_\_
93. If the prosecution called witnesses in this case who had received, or hoped to receive, benefits from the government like immunity or a reduced sentence in exchange for their cooperation and testimony at trial, would that affect your view of their testimony? If so, how?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
94. The Court will instruct you that when you evaluate the testimony of law enforcement officers, you should evaluate them by the same standards as other witnesses, and that they are not to be given more or less credibility because of their position. Is there any reason you cannot follow this instruction?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
95. The government's evidence in this case may include hidden recordings of conversations with the defendant, which are allowed by the law. What is your opinion of the use of these techniques?  
\_\_\_\_\_  
\_\_\_\_\_
96. Would the use of legal hidden recordings make you more suspicious of the government's case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
97. It is the government's decision whom it chooses to charge and not to charge with a crime. Would you be more skeptical of the government's case if they did not prosecute everyone allegedly involved in a crime?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
98. Do you believe that the prosecution of elected officials tends to be politically motivated?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_



**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

99. Do you think that innocent people are often convicted of crimes they did not commit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 If yes, do you think race plays a part?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 Please explain: \_\_\_\_\_  
 \_\_\_\_\_
100. Do you think minorities are generally treated unfairly by the government?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_
101. Do you think it is common for African-American defendants to be criminally prosecuted for crimes that white defendants are not prosecuted for?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_
102. Do you think African-American defendants are punished more harshly than white defendants in the criminal justice system?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_
103. What role, if any, do you think race plays in the criminal justice system?  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
104. How many people do you know who you feel were unfairly detained, arrested or prosecuted?  
 \_\_\_\_\_ No one  
 \_\_\_\_\_ One person  
 \_\_\_\_\_ More than one person  
 If you know at least one person, please describe the type of case and how it affects your view of the criminal justice system: \_\_\_\_\_  
 \_\_\_\_\_
105. Are there any racial or ethnic groups you do not feel comfortable being around?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

106. Do you believe that African-Americans are more likely to commit crimes than whites?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, why do you believe that to be true? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
107. Have you personally observed any minorities who were treated unfairly by the police, law enforcement, or prosecutors?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
108. Do you believe the federal government unfairly focuses on investigating and prosecuting public officials from the Atlanta area?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain why you think this is: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
109. Do you believe the federal government unfairly focuses on investigating and prosecuting African-American public officials rather than officials of other races?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
110. Do you think minority politicians have a harder time succeeding in politics?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
111. What do you think of the current state of racial relations in the United States?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
112. Do you have any negative opinions of the Department of Justice or outgoing U.S. Attorney General Eric Holder?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

113. Do you have any negative opinions of the FBI?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
114. Do you have any negative opinions of the Internal Revenue Service (IRS)?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
115. Do you think that you would be less likely to trust evidence or witnesses from the FBI than you would evidence or witnesses from other sources?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
116. Do you think that you would be less likely to trust evidence or witnesses from the IRS than you would evidence or witnesses from other sources?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
117. Do you have any opinions, beliefs, feelings, or personal experiences related to the FBI that you think might, in any way, affect your ability to be completely fair and impartial in this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
118. Do you have any opinions, beliefs, feelings, or personal experiences related to the IRS that you think might, in any way, affect your ability to be completely fair and impartial in this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
119. Have you or has anyone close to you ever had any bad experiences with the federal government?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

120. Do you think the federal government has too much power?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Media Consumption**

121. What is your MAIN source of news?

\_\_\_\_\_ Television

\_\_\_\_\_ Radio

\_\_\_\_\_ Newspaper

\_\_\_\_\_ Internet

\_\_\_\_\_ Family/Friends

\_\_\_\_\_ I don't follow the news

122. How often do you check, follow, or read the news from any source?

\_\_\_\_\_ Multiple times a day

\_\_\_\_\_ Once a day

\_\_\_\_\_ Several times a week

\_\_\_\_\_ Once or twice a week

\_\_\_\_\_ Less than once a week

\_\_\_\_\_ Almost never

123. Have you or your spouse or domestic partner ever written a letter to the editor of a newspaper, called a radio station, commented online to an article, blogged, or tweeted about a political or governmental issue?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

124. Do you follow (or have you followed) any criminal trials in the news?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, which trials? \_\_\_\_\_

\_\_\_\_\_

125. Have you followed any cases or stories that involve public corruption charges or accusations?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain which cases, and whether you thought they were handled fairly:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

126. What TV programs do you or your spouse/domestic partner watch involving law enforcement, the law, or the Courts?

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127. If you regularly watch TV news programs or listen to talk radio, please list the programs you watch or listen to:

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128. During the jury selection process and, if you are chosen as a juror in the actual trial, you are not permitted to read or listen to any media or Internet coverage of this case and related subjects. Will you be able to follow these restrictions in light of the fact that this trial will be lengthy?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please explain: \_\_\_\_\_

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129. During the jury selection process and, if you are chosen as a juror in the actual trial, the Court will instruct you that you will not be able to blog, tweet, post on Facebook or other social networks, talk about, or otherwise communicate anything about this case or your jury service. Will you be able to follow these restrictions in light of the fact that this trial will be lengthy?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please explain: \_\_\_\_\_

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130. This case has been and will be followed closely by the media and the public. How do you think this will affect you if you were seated as a juror?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

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131. Do you think the media in Atlanta has shown a racial bias in the way they have covered local stories in general?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

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**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

132. Do you believe the news media has been unfair in covering African-American public officials?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**Knowledge About this Case**

The indictment in this case charges State Representative Tyrone Brooks, Sr. with mail, tax, and wire fraud.

133. Have you read or heard anything about this defendant or this case from the media, your friends, your relatives, or any other source?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what have you read or heard? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

134. Do you think the media has been unfair to the defendant?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

135. Despite what you have read, heard, or seen in the media, will you be able to set aside all outside information and follow the evidence and the Judge's instructions in the case?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

136. Have you ever expressed an opinion as to the defendant's guilt or innocence?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what opinion did you express? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

137. What is your opinion, if any, of Representative Brooks? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire****Juror Number:** \_\_\_\_\_

138. Would you be able to put your feelings aside with regard to Representative Brooks and decide the case based on the evidence and the law?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If no, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
139. Do you or anyone close to you know Representative Brooks in any way?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
140. Have you ever had contact with Representative Brooks in any way?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
141. Have you or anyone close to you attended any event where Representative Brooks participated or spoke publicly?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain, including providing the event/entity name: \_\_\_\_\_  
 \_\_\_\_\_
142. Have you or anyone close to you given money to any non-profits, fundraisers or charities associated with Representative Brooks, including Universal Humanities, Visions of Literacy, or the Georgia Association of Black Elected Officials (GABEO)?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain, including providing the organization name and approximate amount and year of any donation: \_\_\_\_\_  
 \_\_\_\_\_
143. Have you, a family member, or close friend ever, to your knowledge voted for Representative Brooks?  
 Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, how many times? \_\_\_\_\_  
 If yes, please explain to the best of your knowledge why you or they voted for him: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
144. Do you or anyone close to you know and/or ever had contact with former Georgia Governor Roy Barnes in any way?  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

145. Have you or anyone close to you attended any event where former Governor Barnes participated or spoke publicly?  
If yes, please explain, including providing the name of the event and the organization:

\_\_\_\_\_  
\_\_\_\_\_

146. Have you or anyone close to you given money to any non-profits, fundraisers or charities associated with former Governor Barnes?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain, including providing the event/entity name and approximate amount and year of any donation: \_\_\_\_\_

\_\_\_\_\_

147. What is your general impression of former Governor Roy Barnes?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Criminal Trial Procedures**

148. Under our Constitution, defendants are presumed to be innocent, and cannot be found guilty of any offense unless and until the government has proven each element of that offense beyond a reasonable doubt. Do you accept this principle and agree to apply it?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If no, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

149. The defendant is not required to testify or to present his side of the story to the jury at all. Under our Constitution, a defendant has the absolute right to remain silent, and the jury may not consider the fact that a defendant chooses not to testify as any evidence against him. A defendant's silence may not be held against him, and you may not consider it in your deliberations. If a defendant does not testify, can you follow the judge's instruction that a defendant's silence may not be held against him?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If no, please explain: \_\_\_\_\_

\_\_\_\_\_

150. Would you need to see "smoking gun" evidence that directly shows a defendant committing or admitting to a crime in order to find him guilty?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_



**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

151. Do you think you would tend to disregard circumstantial evidence and only focus on direct evidence?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
152. The jury must not consider the issue of punishment when deciding whether the defendant is guilty or not guilty. Can you remove the consideration of punishment from your decision as to whether the defendant is guilty or not guilty of the alleged crimes?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If no, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
153. Do you have any personal reason for wanting or not wanting to serve as a juror on this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
154. This trial is expected to last for three to four weeks. Would the length of this trial prevent you from being able to be selected for this jury?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
155. Is there any reason why you could not be fair and impartial to the prosecution, the federal government/Department of Justice or to the defendant in this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
156. Can you think of any reason that would keep you from serving fairly and impartially as a juror in this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

157. Do you have any personal, religious, moral, philosophical, or other beliefs that would make it difficult for you to sit in judgment of another person, or that would prevent you from applying the law given to you by the Court to the evidence of the case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
158. If you are selected to serve as a juror on this case, would you be concerned about reactions to your verdict by anyone, including friends, family members, neighbors, acquaintances, or coworkers?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
159. Do you have any health condition (such as inability to see, hear, concentrate or sit for extended periods) that would make it difficult for you to serve as a juror?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
160. Are you currently taking any medication or using alcohol or drugs (including illegal drugs) which may prevent you from giving your full attention to the case?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
161. Do you presently, or have you in the past five years, had a mental or psychiatric condition (including mood disorders or addictions) for which you required treatment or medication?  
Yes \_\_\_\_\_ No \_\_\_\_\_ Unsure \_\_\_\_\_  
Please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
162. Do you have any personal, professional, or financial obligations that would prevent you from giving your full attention to this case or prevent you from being in court during this trial?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

163. Have you recently suffered any financial hardships?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe: \_\_\_\_\_

\_\_\_\_\_

164. Did you know or did you recognize anyone on this jury panel, or anyone else in this courtroom, before reporting for jury service today?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, who do you know and how do you know them? \_\_\_\_\_

\_\_\_\_\_

165. The following persons will play a role in this trial:

a. The judge presiding in this case is Judge Amy Totenberg.

b. The government in this case is represented by Kurt R. Erskine, Richard S. Moultrie, Jr., and Kamal Ghali of the U.S. Attorney's Office.

c. The defendant is represented by one or more of the following attorneys: Roy E. Barnes, Thomas Hawker, and Natasha Perdew-Silas.

Do you know or have you had any contact, whether social or professional, with these persons or any current or former members of their offices?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please give details: \_\_\_\_\_

\_\_\_\_\_

166. Is there anything else not covered by this questionnaire that you think the Court or the lawyers should know about you that may affect your jury service in this case, or that may influence your ability to fairly and impartially judge the evidence in this case and to apply the law as instructed by the Court?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

167. Is there anything that you think would be relevant to this case or your service as a juror that you did not include on this questionnaire and would prefer to discuss privately?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



[illegible]

[illegible]

**CONFIDENTIAL Questionnaire**

**Juror Number:** \_\_\_\_\_

### AFFIRMATION

I, \_\_\_\_\_, hereby declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others or received assistance in completing the questionnaire. I have answered all of the above questions in this Jury Questionnaire myself.

Executed in the \_\_\_\_\_, on this \_\_\_\_ day of \_\_\_\_\_, 2015

Signature

\_\_\_\_\_